

Title:

Mr

Forename:

Guenther

Surname:

Martis

Representing:

Organisation

Organisation (if applicable):

CANSO

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

CANSO represents the Civil Air Navigation Service Providers, using the VHF Comm frequencies as integral part of their business, together with our customers, the aircraft operators.

CANSO notes with interest the work done so far in the context of Administered

Incentive Pricing, but does currently not support the AIP model as such, promoting the current frequency allocation nonetheless in a more transparent and efficient way.

From the basic description of how and why the Ofcom proposal should be applied it seems that there is no understanding of how and for what the aeronautical frequencies are used, who controls their utilization and how the users can influence the efficient utilization of the frequencies. Trying to force market mechanisms artificially to this sector will create artificial bottlenecks in a globally operated and aligned communication network.

To force new technologies in this aeronautical sector is not at all the role of Ofcom with its limited scope of application over the UK.

Other bodies under European Union's regulatory umbrella are already developing concepts for new technologies ? the SESAR Joint Undertaking.

ICAO as the global organisation is the only one appropriate to drive technology for aviation with the necessary global scope and acceptance by States.

It is somehow disappointing that all the explanations, consultations and comments provided by all aeronautical industry players over the past years are still largely ignored.

Question 1: Do you consider that our proposed fee rates for licences in the aeronautical VHF frequencies are appropriate?:

No, CANSO does not consider any fee or pricing as proposed on aeronautical VHF frequencies to be appropriate, as the application of such a method is in our view the wrong tool and approach to increase the spectrum efficiency.

Question 2: In devising our revised proposals, have we identified all of the aeronautical uses of VHF communications frequencies which require a distinct approach to fee setting, as set out in tables 5 and 6?:

No answer provided

Question 3: Do you agree with our proposal not to charge any fees for Fire assignments?:

Yes, but we do not agree to the basic principle proposed to be applied for charging for the use of aeronautical VHF frequencies.

Question 4: Do you agree with our proposal to set a £75 fee for licences in any of the sporting frequencies?:

No, as we do not agree to the basic principle proposed to be applied for charging for the use of aeronautical VHF frequencies.

Question 5: Do you agree with our proposal to set an annual fee of £19,800 per ACARS or VDL assignment, with no variation related to the number of transmitters?:

No, as we do not agree to the basic principle proposed to be applied for charging for the use of aeronautical VHF frequencies.

Question 6: Do you consider that our proposed approach to phasing in fees for use of the aeronautical VHF communications channels are appropriate? If there are particular reasons why you consider that any user or group of users would need longer phasing-in periods, please provide any supporting evidence for us to consider. Specifically, do you have any evidence for us to consider that would support either of Options 1 and 2 for the highest proposed fee in this sector?:

No, as we do not agree to the basic principle proposed to be applied for charging for the use of aeronautical VHF frequencies.

Question 7: Do you have any further quantified information to contribute to the analysis of financial impacts of the proposed fees on particular spectrum users, as set out in Annex 5? We would like to publish all responses, but will respect the confidentiality of any material which is clearly marked as such.:

NO

Question 8: Do you consider that our assessment of the impacts of our proposals has taken full account of relevant factors? If you consider that there is additional evidence that would indicate particular impacts we should take into account, we would be grateful if you could provide this.:

No. From the basic description of how and why the Ofcom proposal should be applied it seems that there is a totally different interpretation and understanding of how and for what the aeronautical frequencies are used, who controls their utilization and how the users can influence the efficient utilization of the frequencies. To try to force market mechanisms artificially to this sector will create artificial bottlenecks in a globally operated and aligned communication network.